

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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ATLAS DATA PRIVACY  
CORPORATION, *as assignee of*  
*individuals who are Covered Persons*,  
JANE DOE-1, *a law enforcement*  
*officer*, JANE DOE-2, *a law*  
*enforcement officer*, EDWIN  
MADONADO, SCOTT MALONEY,  
JUSTYNA MALONEY, and WILLIAM  
SULLIVAN,

Plaintiffs,

v.

BABEL STREET INC., RICHARD  
ROES 1-10, *fictitious names of unknown*  
*individuals* and ABC COMPANIES 1-  
10, *fictitious names of unknown entities*,

Defendants.

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Civil Action No. No. 1:24-cv-10596

Honorable Harvey Bartle III

**CERTIFICATION OF JORDAN S.  
JOACHIM, ESQ. IN SUPPORT OF  
MOTION FOR *PRO HAC VICE*  
ADMISSION**

**JORDAN S. JOACHIM**, of full age, hereby certifies as follows:

1. I am an attorney licensed to practice in the State of New York and am a Special Counsel Covington & Burling LLP, counsel for Defendant Babel Street, Inc. (hereafter “Babel”) in the above-captioned matter. I submit this Declaration in support of the application for my admission *pro hac vice* pursuant to Local Rule 101.1.

2. I am a member of good standing of the following bars:

<b>Bar</b>	<b>Date Admitted</b>
<p>State of New York</p> <p>Appellate Division, First Judicial Department 41 Madison Avenue (at 26th Street) - 26th Floor New York, N.Y. 10010</p>	June 27, 2016
<p>United States District Court for the Southern District of New York</p> <p>Ruby J. Krajick, Clerk of the Court 500 Pearl Street New York, NY 10007</p>	December 13, 2016
<p>United States District Court for the Eastern District of New York</p> <p>Douglas C. Palmer, Clerk of the Court 225 Cadman Plaza East Brooklyn, NY 11201</p>	August 29, 2018
<p>United States Court of Appeals for the Second Circuit</p> <p>Attorney Admissions Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007</p>	December 16, 2019
<p>United States Court of Appeals for the Third Circuit</p> <p>Attorney Admissions James A. Byrne U.S. Courthouse 601 Market Street Philadelphia, PA 19106</p>	January 22, 2021
<p>United States Court of Appeals for the Seventh Circuit</p> <p>Attorney Admissions Everett McKinley Dirksen United</p>	November 4, 2022

States Courthouse 219 S. Dearborn Street Chicago, IL 60604	
United States Court of Appeals for the Federal Circuit  Attorney Admissions 717 Madison Place, N.W. Washington D.C. 20439	January 3, 2019

3. I am a Special Counsel in the law firm of Covington & Burling LLP, The New York Times Building, 620 Eighth Avenue, New York, NY 10018-1405.

4. I certify that there are no disciplinary proceedings pending against me in any jurisdiction, and no discipline has previously been imposed upon me in any jurisdiction.

5. I am representing Babel in this matter. In that capacity, I have become familiar with Babel's products and have specialized training related to the issues relevant to this matter.

6. Because of my firm's long-standing relationship with Babel and my familiarity with issues relevant to this matter, Babel has requested that I represent them in connection with this lawsuit.

7. I understand that I have a continuing obligation to notify the Court of any matter affecting my standing with the bars described above or with any other court in which I am admitted to practice.

8. I have reviewed the New Jersey Court Rules and agree to comply with said Rules, including all disciplinary rules, during the period of my pro hac vice admission.

9. I consent to the appointment of the Clerk of the Supreme Court of New Jersey as the agent upon whom service of process may be made for all actions against me or my firm that arise out of my participation in this matter.

10. I agree to have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in the State of New Jersey.

11. I certify that all retainer agreements with clients in the subject litigation do not, and in the future will not, violate any of the contingency fee provisions found in the New Jersey Court Rules.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Jordan S. Joachim

Dated: December 4, 2024